

EXHIBIT D

Ashley T Adams
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February 08, 2007

Casarino Christman & Shalk, P.A.
800 North King Street
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Wilmington, DE 19899

Request for Deposition dates [February 2007]

Pursuit Rule 26.1 (b) – ‘there shall be no limitation upon the permissible number of document requests,or depositions’. Unless you comply with the Civil Procedure Rules, I will be filing a motion with the Court for immediate compliance. You have 10 days from the date of this letter to comply.

You have not complied with the request of producing telephone documents that were requested at the deposition done by Charles Cooper. The telephone document that was received was a cellular telephone transcript, but does not identify that this is the cellular telephone used by JoEllen Sheldon on that day. This does not appear to be her cellular telephone record, for if it is, it contradicts her statement under oath, ***“that she initiated a telephone call for 9.1.1.”*** The cellular telephone record submitted does not show a 9.1.1. call on this record. 9.1.1. calls will always show on any telephone record, contrary to your letter of explanation. This telephone record supplied is not the actual record for JoEllen Sheldon on the day in question. This appears to be another account holder’s telephone log. JoEllen Sheldon testified under oath ***“that she was not talking on her cellular telephone at the time of the accident caused by her”***. The records supplied are incomplete and inconsistent with her testimony. You failed to produce documents requesting telephone logs.

Your continued attempts to cause delays, avoid prosecution against Sheldon, are rising to the level of contempt, and so shall be dealt with appropriately. Immediately provide those (4) dates in February as requested in January.

Ashley Adams